

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2024-cv-09743/25-cv-2031/24-cv-7442/25-cv-4505

Lucio Celli,

Plaintiff,

v.

New York City et al,

Defendants.

RE: PLAINTIFF'S MOTION FOR SANCTIONS AGAINST ASSISTANT UNITED STATES ATTORNEYS FOR CONCEALING MATERIAL FILINGS, Wage theft, federal crimes by Weingarten/UFT AND FACILITATING FRAUD ON THE COURT since July 20, 2021 and Engelmayer pretends—each time that I file or bring it up to him—Silverman obstructed justice and admitted it was for Randi/Cogan with Kopplin cc'ed with evidence and Livingston misconduct in this too

Dear Hon. Cronan, Hon. Gujarati, Hon. Rearden, Hon. Conrad Pres Trump, AG Bondi, Rep Green, Ms. Kopplin, Sen. Jud. and House Jud

PLAINTIFF'S MOTION FOR SANCTIONS AGAINST ASSISTANT UNITED STATES ATTORNEYS FOR CONCEALING MATERIAL FILINGS, WAGE THEFT, AND FACILITATING FRAUD ON THE COURT

Plaintiff Lucio Celli respectfully moves this Court, pursuant to its inherent authority and Federal Rules of Civil Procedure 11, 26, and 37, to impose sanctions against the Assistant United States Attorneys ("AUSAs") assigned to this matter for knowingly concealing over fifty (50) critical filings and motions, as well as material evidence of wage theft involving Judge Brian Cogan and Randi Weingarten. These concealments constitute bad faith litigation conduct, obstruction of justice, and a coordinated effort to suppress constitutional claims and protect politically connected actors from judicial scrutiny.

Engelmayer pretends not to know about Randi Weingarten's and Cogan's criminal conduct of obstruction, but it was written to Judge Weir too, and Kopplin is my witness and has the same evidence that Livingston is helping to conceal

Therefore, Kopplin has knowledge and evidence of the misconduct the AUSAs and Schumer/Gillibrand's judges in aiding Randi Weingarten and Judge Cogan in a federal crime, as my employer mentioned penis, Cogan and Bharara's investigation into the UFT—which is besides NYS crime and has knowledge and Schumer/Gillibrand's misconduct under 18 USC § 245 as does the AUSAs

am entitled to my wages and Engelmayer/Lehrburger prevented witnesses and evidence to enter but the AUSAs know and Kopplin is my witnesses for the misconduct of Livingston, Wolfe, Aaron, Rearden, Engelmayer and now Gujarati, as I am entitled to wages already earned, which is separate from the retro money too or illegal detentions by Randi Weingarten that deprived me of wages and pension credit .

Gujarati knows that she committed a crime for Randi Weingarten and Sen. Gillibrand under 18 USC 371 –as I just remembered that I did not plead who and what until I was before Lehrburger, but my lawyers knew and the AUSAs knew, as did Kopplin./

I request that Pres Trump, AG Bondi and the Senate have Karamigios/Bensing/Kopplin correct the record, especially the AUSAs because they lied and took months away from me to help conceal facts for Randi and Cogan

I. GROUNDS FOR SANCTIONS

1. The AUSAs involved in this matter knowingly concealed motions, declarations, and evidence of wage and pension theft committed under the direction of Judge Brian Cogan and Randi Weingarten. This concealment began on or about July 20, 2021, and continues to the present.
2. Plaintiff has direct evidence that attorney Ben Silverman, acting in concert with Randi Weingarten and Judge Cogan, obstructed the docketing of these filings and suppressed critical facts regarding wage theft, retaliation, and deprivation of due process.
3. **AUSA Anna Karamigios** not only failed to disclose these materials, but also made knowingly false representations about Plaintiff's wages and benefits, and coordinated with **AUSA Lombardo**, who echoed these misrepresentations to the Court.
4. **Ms. Kopplin** of the Senate Ethics Committee has reviewed and retains evidence confirming that Judge Engelmayer permitted Randi Weingarten and Judge Cogan

to **intimidate Plaintiff's mother**, and deliberately ignored documentation of ongoing wage theft. Kopplin further has documentation of over 50 motions and filings being deliberately omitted from the docket.

5. Judge Engelmayer has repeatedly disregarded evidence of wage theft while protecting the role of politically connected actors, including those affiliated with Senator Schumer and Senator Gillibrand. He has also ignored how and what Judge Cogan and Randi Weingarten were doing to Plaintiff, to the point of helping them deprive Plaintiff of access to HIV medications and concealing the criminal conduct of Plaintiff's attorneys who acted in service of those politically protected individuals.
 6. Chief Judge Debra Ann Livingston, with the assistance of Clerk of Court Wolfe, participated in concealing this misconduct by facilitating the suppression of filings and shielding AUSAs from accountability, despite knowledge of the fraud.
 7. The pattern of omissions and false filings constitutes **fraud on the court**, in addition to a broader **conspiracy to deprive rights under 18 U.S.C. § 241**, and should be sanctioned accordingly.
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II. LEGAL STANDARD

Courts have inherent power to impose sanctions where a party has acted in bad faith, vexatiously, wantonly, or for oppressive reasons. See *Chambers v. NASCO, Inc.*, 501 U.S. 32, 45–46 (1991).

Federal Rule of Civil Procedure 11 authorizes sanctions for misrepresentations and omissions that abuse judicial process. Rule 37(b) authorizes sanctions for failure to comply with discovery and disclosure obligations.

III. RELIEF REQUESTED

Plaintiff respectfully requests that this Court:

1. Issue sanctions against AUSAs Anna Karamigios, Lombardo, and any other DOJ attorneys who knowingly concealed motions, wage data, and prior court orders;
 2. Order production and public docketing of all withheld filings, including evidence of wage theft and intimidation;
 3. Refer the conduct to the Department of Justice Office of Professional Responsibility (OPR) and Public Integrity Section;
 4. Compel a full evidentiary hearing into the role of the AUSAs, Judges Engelmayer and Cogan, Clerk Wolfe, and Randi Weingarten in suppressing filings, obstructing access to medical care, and violating Plaintiff's constitutional rights.
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IV. CONCLUSION

The concealment of material filings and wage theft by AUSAs, with full knowledge of senior judges and politically connected actors, constitutes a grave abuse of public trust. It reflects an ongoing conspiracy to protect Randi Weingarten and obstruct judicial remedies for victims of political retaliation. Sanctions, disclosures, and accountability are necessary to preserve the rule of law.

Respectfully submitted,

/s/ Lucio Celli

Respectfully submitted,
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